

ATTACHMENT B-2

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

1. Do you belong to any social, civic religious, or professional organizations? If so, please state the groups and how often you attend meetings or functions.
2. Do you have any legal training or background? If so, please explain.
3. Do you have a college degree? If so, in what?
4. Have you ever been arrested? If so, please explain what happened.
5. Have you ever been convicted of a crime? If so, please explain what happened.
6. Have you ever been the subject of a criminal background check?
7. Have you or anyone you know ever been the subject of a criminal background check that contained a mistake?
8. Have you or anyone you know ever been denied a job or lost a job as a result of information on a criminal background check?
9. Have you or anyone you know ever been the subject of a credit report that contained a mistake?
10. Do you review criminal background checks as part of your job?
11. Do you review court records as part of your job?

12. Do you have any experience with locating criminal records in court databases?

13. Do you review or process large amounts of data in your job?

14. Have you ever been a party to a lawsuit? If so, were you the plaintiff or the defendant? What was the case about?

15. Do you believe, as a general matter, that all mistakes entitle a person to money?

16. Do you know any of the following persons: Tony Smith, Stephanie Vasquez, Gregory Gorski, James Marvin Feagle, Justin Holcombe, Craig Kessler, Ross Andre, Cindy Hanson, Stephanie Morgan, Dolly Bergan, Peggy O'Neill, Randy Luckow? If so, who? How do you know them? Would your relationship affect your ability to be impartial in this case?

17. Do you know any person employed by Kilpatrick Townsend & Stockton, LLP, Francis & Mailman, P.C., Skaar & Feagle, LLP, e-Backgroundchecks.com, Inc., or General Information Services, Inc.? If so, how? Would your relationship affect your ability to be impartial in this case?

18. Would service as a juror in this matter impose any special hardship or inconvenience upon you?